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Attorneys for Defendant and Cross-Complainant
PAULEY CONSTRUCTION, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SIFA TUIAKI and LUPE TUIAKI,

Plaintiffs,

v.

PACIFIC GAS AND ELECTRIC
COMPANY, PAULEY
CONSTRUCTION, INC., TRAFFIC
SOLUTIONS, INC., ADELPHIA
TELECOMMUNICATIONS CO., INC.,
SBC TELECOMMUNICATIONS, INC.,
MOBILE TOOL INTERNATIONAL, INC.
dba TELSTA, COUNTY OF
MENDOCINO, STATE OF
CALIFORNIA, PACIFIC BELL
TELEPHONE COMPANY, PACIFIC
TELESIS GROUP, SBC OPERATIONS,
INC., and DOES 1 to 50,

Defendants.

AND RELATED CROSS-ACTION.

CASE NO.: C07 2257 JCS

**PAULEY CONSTRUCTION, INC.'S.
STATEMENT DENYING ALL
ALLEGATIONS IN ADELPHIA
COMMUNICATIONS CORPORATION'S
NOTICE OF REMOVAL [FEDERAL
RULE OF BANKRUPTCY PROCEDURE
9027(e)(3)]**

TRIAL BY JURY DEMANDED

COMES NOW Cross-defendant, Pauley Construction, Inc. (hereinafter "Pauley"), pursuant to Federal Rule of Bankruptcy Procedure 9027(e)(3), files this statement denying any allegations in Adelphia Communication Corporation's ("Adelphia") Notice of Removal and classifying all proceedings, claims and/or causes of action alleged by Adelphia to be non-core. Pauley does not

PAULEY CONSTRUCTION, INC.'S. STATEMENT DENYING
ALL ALLEGATIONS IN ADELPHIA COMMUNICATIONS
CORPORATION'S NOTICE OF REMOVAL [FEDERAL RULE
OF BANKRUPTCY PROCEDURE 9027(e)(3)]

1 consent to entry of final orders or judgment by the bankruptcy judge.

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3 DATED: May 4, 2007

CLAPP, MORONEY, BELLAGAMBA
and VUCINICH

5
6 By: 

JEFFREY M. VUCINICH

JOSHUA W. ROSE

Attorneys for Defendant/Cross-Complainant/

Cross-Defendant

PAULEY CONSTRUCTION, INC.